

EXHIBIT 1

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	2:21-cv-08915-RGK-E	Date	November 22, 2022
Title	<i>Shenzhen Gooloo E-Commerce Co., Ltd. v. Pilot, Inc.</i>		

Present: The Honorable R. GARY KLAUSNER, UNITED STATES DISTRICT JUDGE

Sharon L. Williams

Not Reported

N/A

Deputy Clerk

Court Reporter / Recorder

Tape No.

Attorneys Present for Plaintiff:

Attorneys Present for Defendant:

Not Present

Not Present

Proceedings: **(IN CHAMBERS) Order Re: Plaintiff's Application for Temporary Restraining Order [DE 14]**

I. INTRODUCTION

On November 12, 2021, Shenzhen Gooloo E-Commerce Co. ("Plaintiff") filed a complaint against Pilot Automotive, Inc. ("Defendant"), requesting a declaration that it does not infringe on Defendant's patent and that Defendant's patent is invalid, and alleging various state-law tort claims. On November 17, 2021, Plaintiff filed the instant Application for Temporary Restraining Order ("TRO Application").

For the reasons sets forth below, the Court **DENIES** Plaintiff's TRO Application.

II. FACTUAL BACKGROUND

Plaintiff is an online retailer that earns nearly 80% of its total sales revenue from Amazon.com. (Zhou Decl. ¶5, ECF No. 14-40.) Plaintiff's products are primarily electric jump starters and power stations that are manufactured by a third party, Shenzhen Caraku Technology Co. (*Id.* ¶ 6.) Defendant sells numerous products, including automotive accessories such as lithium car jump starters. (Def.'s Opp. to TRO App. 5, ECF No. 18.) Defendant owns numerous patents, including U.S. Patent No. 10,046,653 ("the '653 Patent"), which describes a "novel automobile charger." (Kirtley Decl., Ex. A, at 170, ECF No. 14-21.)

Defendant has a history of aggressively defending its patent portfolio. At issue in this TRO Application is Defendant's use of Amazon.com's patent-enforcement system, known as Amazon Utility Patent Neutral Evaluation ("UPNE"). (Zhou Decl. ¶ 8.) An Amazon seller may submit a patent infringement complaint via UPNE, whereupon Amazon will review the complaint and then usually urge the parties to come to a mutually beneficial resolution. If the parties are not able to reach a resolution, Amazon may choose to remove the allegedly infringing products from its online store. (Wan Decl., Ex.

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6, ECF No. 14-10.) While UPNE evaluators generally do not consider a patent's validity, they do determine whether the patent owner is "likely to prove" that the accused products infringe upon the asserted claim. (*Id.*)

In June 2020, Defendant initiated a challenge under the UPNE system, alleging that some of Plaintiff's products infringed upon the '653 Patent's claims. (Wan Decl., Ex. 7 at 67, ECF No. 14-11.) In October 2020, the UPNE evaluator found that Defendant was "likely . . . able to prove" that the accused products infringed upon the '653 Patent. (Wan Decl., Ex. 8, ECF No. 14-11.) After Amazon delisted the accused products, Plaintiff and Defendant entered into a settlement and licensing agreement, which resulted in Amazon re-listing Plaintiff's products. (Zhou Decl. ¶ 12.) As part of the licensing agreement, Plaintiff was obligated to timely and accurately report its jump starter sales to Defendant. (Def.'s Opp. to TRO App., at 6.)

The parties disagree on the events that occurred after they entered into the licensing agreement. Plaintiff asserts that its manufacturer redesigned the circuitry and source code of its jump starters so that they would not infringe upon the '653 Patent. (Zhou Decl. ¶ 13.) Plaintiff then sold some of its allegedly non-infringing products under the same Amazon Standard Identification Numbers ("ASIN") as its infringing products in order to preserve its reviews and ratings. (*Id.* ¶ 14.) Plaintiff asserts that it alerted Defendant that the majority of its sales from Q3 2021 onward would be from the redesigned products, and that it provided Defendant with a list of the ASINs used to sell those products. (Wan Decl., Ex. 12 at 83, ECF No. 14-16.) Defendant, on the other hand, asserts that Plaintiff was consistently underreporting its jump starter product sales, which was a material breach of the parties' licensing agreement. (Def.'s Opp. to TRO App., at 6.) Defendant, focusing on the fact that Plaintiff admittedly sells its non-infringing products under some of the same ASINs as its infringing products, believes that Plaintiff's sales are not limited to the non-infringing products, but also include products covered by the licensing agreement. (*Id.* at 8.)

After the parties were unable to resolve their dispute, Defendant submitted a second challenge under UPNE on September 14, 2021, requesting that Amazon once again delist the allegedly infringing products. (Wan Decl., Ex. 13, ECF No. 14-17.) Plaintiff asserts that Amazon immediately delisted the accused products, including ASIN B07BLM981K (the "GP2000 jump starter") and ASIN B07QDXL1PW (the "GP4000 jump starter"). (Zhou Decl. ¶¶ 17–18.) In response, Plaintiff sent five appeals to Amazon: four in September and one in November. Each was summarily denied. (*Id.* ¶ 19.)

III. JUDICIAL STANDARD

While a preliminary injunction is intended to preserve the status quo pending a judgment on the merits, a TRO is intended to preserve the status quo only until a preliminary injunction hearing can be

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held. *Hoechst Diafoil Co. v. Nan Ya Plastics Corp.*, 174 F.3d 411, 422 (4th Cir. 1999) (citing *Granny Goose Foods, Inc. v. Bhd. of Teamsters & Auto Truck Drivers Local No. 70 of Alameda Cty.*, 415 U.S. 423, 439 (1974)). “Consequently, [TROs] are of limited duration, not—like preliminary injunctions—of indefinite duration.” *Id.*

Despite this difference, the standard for a TRO is “substantially identical” to the standard for a preliminary injunction. *See Stuhlberg Int’l Sales Co., Inc. v. John D. Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir. 2001). To obtain a TRO or a preliminary injunction, the moving party must show: (1) a likelihood of success on the merits; (2) a likelihood of irreparable harm to the moving party in the absence of preliminary relief; (3) that the balance of equities tips in favor of the moving party; and (4) that an injunction is in the public interest. *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008). The court may also apply a sliding scale test, in which the elements of the *Winter* test are balanced “so that a stronger showing of one element may offset a weaker showing of another.” *All. for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131 (9th Cir. 2011). Even under the sliding scale test, however, a plaintiff must demonstrate imminent irreparable harm; a court must not issue a TRO without such a showing. *Oakland Tribune, Inc. v. Chronicle Pub. Co., Inc.*, 762 F.2d 1374, 1376 (9th Cir. 1985). The moving party has the burden of persuasion. *Hill v. McDonough*, 547 U.S. 573, 584 (2006).

IV. DISCUSSION

Plaintiff seeks a TRO ordering Defendant to withdraw its September 14, 2021 UPNE challenge, thus allowing Plaintiff to continue selling its products until the Court can hold a preliminary injunction hearing. Because Plaintiff has not demonstrated imminent irreparable harm prior to such a hearing, the Court **DENIES** the TRO Application.¹

Plaintiff argues that Defendant’s actions have caused it to lose half of its revenue. As a result, it may be forced to lay off half of its workforce and faces the possibility that Amazon might “completely shut down Gooloo’s storefronts,” resulting in the company going out of business. (TRO App., at 16, ECF No. 14.) Plaintiff further asserts that an inability to sell its best-selling products during the holidays will only worsen its financial outlook. (*Id.* at 17.) Finally, Plaintiff argues that it faces a loss of consumer goodwill if its products continue to be delisted, as a delisted product rapidly falls in the Amazon rankings and results in fewer page views for the seller. (*Id.*)

Loss of business and diversion of potential customers may be irreparable harm. *See, e.g., Am. Trucking Ass’n, Inc. v. City of Los Angeles*, 559 F.3d 1046, 1052 (9th Cir. 2009); *Beyond Blond Prods. LLC v. Heldman*, 479 F. Supp. 3d 847, 888 (C.D. Cal. 2021). Past lost sales, however, are a

¹ Because a party may not obtain a TRO without showing imminent irreparable harm, the Court does not analyze the remaining *Winter* factors.

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quintessential example of harm that may be remedied legally, via an award of money damages. *L.A. Mem'l Coliseum Comm'n v. Nat'l Football League*, 634 F.2d 1197, 1202 (9th Cir. 1980) (holding that economic harm is not normally irreparable). While Plaintiff argues that the delisting could ultimately destroy its business, Plaintiff's irreparable harm argument faces a critical problem: it does not appear that its "flagship" products have actually been removed from Amazon's website. Plaintiff asserts that the GP2000 and GP4000, "top seller[s] [and] Flagship product[s] . . . were delisted," and that sales have never recovered "since the two Flagship Products remain delisted." (Zhou Decl. ¶¶ 17–18, 20.) As Defendant notes, however, these products, along with many others, remain available for purchase on Amazon. Indeed, as of November 19, 2021, the GP 4000 was Amazon's tenth best-selling jump starter, and the GP2000 was the twenty-seventh best-selling jump starter. *See* <https://www.amazon.com/gp/bestsellers/automotive/318336011> (last visited November 19, 2021).²

Further, while Plaintiff provides an email from Amazon noting that certain products may be removed from Amazon's warehouse on December 12, the same email notes that Plaintiff may delay the product's removal for at least 30 days pending an appeal or an attempt to remedy the issue. (Zhou Decl., Ex. D at 35, ECF No. 14-44.) Given that Plaintiff's "flagship products" remain listed for sale on Amazon, and that Plaintiff may delay any removal of these products from Amazon's warehouses until at least January 14, 2022 (after the holiday season), the Court finds that any future harm is not imminent. To the extent any product delisting has caused Plaintiff to lose revenue, Plaintiff may recover that lost revenue as damages should it prevail in this action.

Finally, Plaintiff first learned that its products faced delisting on September 14. (Zhou Decl. 17–18.) Despite having its appeals to Amazon rejected at least four times in the month of September, it nonetheless waited more than a month and a half to bring this TRO Application. Such a delay adds additional weight against an argument that Plaintiff faces imminent irreparable harm. *See Miller ex rel. NLRB v. Cal. Pac. Med. Ctr.*, 991 F.2d 536, 544 (9th Cir. 1993) (holding that, while delay in seeking TRO is not dispositive, a delay "before seeking [injunctive relief] implies a lack of urgency and irreparable harm").

² Defendant failed to request judicial notice of this information, but the Court has the power to grant judicial notice *sua sponte*. Fed. R. Evid. 201(c)(1). Courts may take judicial notice of publicly available websites. *See, e.g., Wible v. Aetna Life Ins. Co.*, 375 F. Supp.2d 956, 965 (C.D. Cal. 2005) (granting judicial notice over two Amazon.com pages).

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V. **CONCLUSION**

For the foregoing reasons, the Court **DENIES** Plaintiff's TRO Application.

IT IS SO ORDERED.


Initials of Preparer


EXHIBIT 2



Hello
Select your address


All





Hello, Sign in
Account & Lists

Returns
& Orders



AllBest SellersAmazon BasicsEpic Daily DealsCustomer ServicePrimeNew ReleasesBooksRegistryPharmacyFashion

Satisfyer

Vibrators

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ADULTS ONLY

Satisfyer > For Women > Vibrators

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FOR MEN ▾

FOR COUPLES ▾

APP PRODUCTS

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Satisfyer Power Flower

12 Powerful Vibration Programs Combined with a Flexible Shaft and a Narrow Split Tip

~~\$39.99~~ ~~\$39.59~~ (Count)

 prime

Only 15 left in stock - order soon.



~~\$34.34~~ ~~\$34.34~~ (Count)

 prime



~~\$45.92~~ ~~\$45.92~~ (Count)

 prime



~~\$45.92~~ ~~\$45.92~~ (Count)

 prime



~~\$45.92~~

 prime

Only 9 left in stock - order soon.



~~\$45.92~~ ~~\$45.92~~ (Count)

 prime



~~\$45.92~~ ~~\$45.92~~ (Count)

 prime

Only 15 left in stock - order soon.

Satisfyer Wand-er Woman (White)

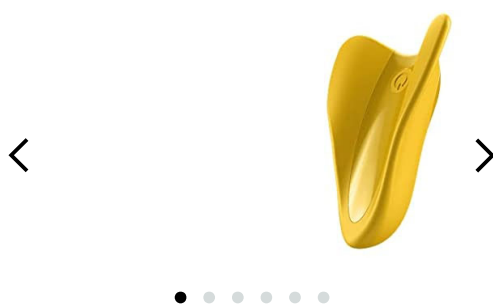
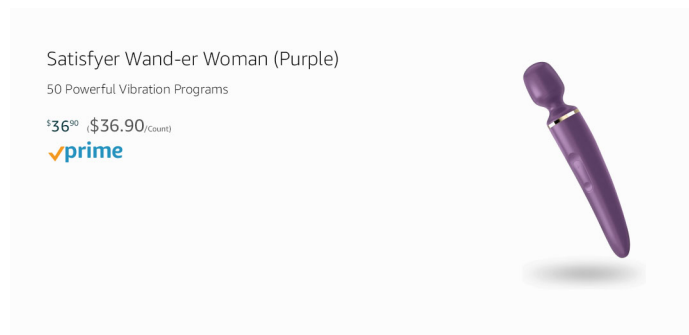
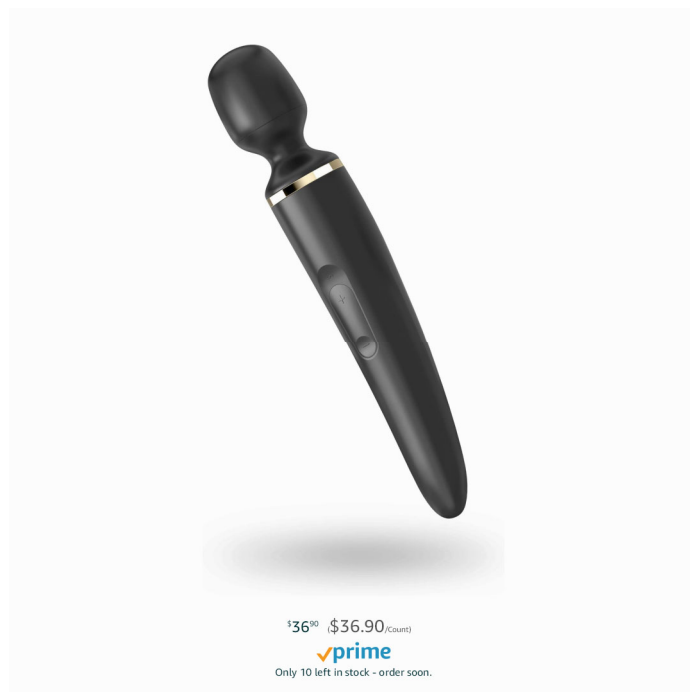
50 Powerful Vibration Programs

~~\$36.90~~ ~~\$36.90~~ (Count)

 prime

Only 13 left in stock - order soon.





Satisfyer High Fly Finger Vibrator -
10 Vibration Programs for
Stimulation of The Clitoris, Penis
and Erogenous Areas - Waterproof,
Rechargeable...



Color (2):
Yellow



\$29⁹⁵ (\$29.95/Count)
prime

Get it by Sunday, December 12.

- **VERSATILE STIMULATION** - The High Fly Finger Vibrator is designed to be easily worn on your hand, making it perfect for stimulating the clitoris, penis shaft, or any erogenous area you

✓ [Show more](#)

See all details

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Sold by EIS-Inc. and Fulfilled by Amazon.



Satisfyer Mono Flex Rabbit Vibrator with App Control - G-Spot and Clitoris

★★★★★ 30

\$49⁹⁵ (\$49.95/Count)

✓prime

Add to Cart



Satisfyer Mono Flex Rabbit Vibrator with App Control - G-Spot and Clitoris

★★★★★ 30

\$49⁹⁵ (\$49.95/Count)

✓prime

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Satisfyer Mono Flex Rabbit Vibrator with App Control - G-Spot and Clitoris

★★★★★ 30

\$49⁹⁵ (\$49.95/Count)

✓prime

Only 17 left in stock - order soon.

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Satisfyer Sparkling Darling Bullet Vibrator - Travel-Size Clitoral Stimulator,

★★★★★ 70

\$29⁹⁵ (\$29.95/Count)

✓prime

Add to Cart



Satisfyer Lovely Honey Bullet Vibrator - Travel-Size Clitoral Stimulator,

★★★★★ 70

\$29⁹⁵ (\$29.95/Count)

✓prime

Only 13 left in stock - order soon.

Add to Cart



Satisfyer Secret Affair Bullet Vibrator - Travel-Size Clitoral Stimulator, Personal

★★★★★ 6

\$29⁹⁵ (\$29.95/Count)

✓prime

Only 13 left in stock - order soon.

Add to Cart



Satisfyer Sweet Treat Lay-On Clitoral Stimulator - Spinning Silicone Head,

★★★★★ 135

\$29⁹⁵ (\$29.95/Count)

~~\$39.95~~ (25% off)

✓prime

Only 18 left in stock - order soon.

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Satisfyer Sweet Treat Lay-On Clitoral Stimulator - Spinning Silicone Head,

★★★★★ 135

\$29⁹⁵ (\$29.95/count)

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✓prime

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Satisfyer Sweet Treat Lay-On Clitoral Stimulator - Spinning Silicone Head,

★★★★★ 135

\$29⁹⁵ (\$29.95/Count)

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✓prime

Add to Cart



Satisfyer Dark Desire Lay-On Vibrator -
Powerful Vibrating Clitoral Stimulator,...

★★★★★ 8

\$29⁹⁵ (\$29.95/Count)

✓prime

Only 16 left in stock - order soon.

Add to Cart



Satisfyer Purple Pleasure Lay-On
Vibrator - Powerful Vibrating Clitoral

★★★★★ 105

\$29⁹⁵ (\$29.95/Count)

✓prime

In stock soon.

Add to Cart



Satisfyer Little Wand Lay-On Vibrator -
Powerful Vibrating Clitoral Stimulator,...

★★★★★ 20

\$29⁹⁵ (\$29.95/Count)

✓prime

Only 5 left in stock - order soon.

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Satisfyer White Temptation Lay-On
Vibrator - Powerful Vibrating Clitoral

★★★★★ 19

\$19⁹⁵ (\$19.95/Count)

✓prime

Add to Cart



Satisfyer Double Wand-er Wand Vibrator
with App Control - XXL Personal

\$99⁹⁵ (\$99.95/Count)

✓prime

Only 5 left in stock - order soon.

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Satisfyer Candy Cane Finger Vibrator -
10 Vibration Programs for Stimulation of

★★★★★ 1

\$25⁴⁷ (\$25.47/Count)

~~\$29.95~~ (14% off)

✓prime

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Satisfyer Candy Cane Finger Vibrator -
10 Vibration Programs for Stimulation of

★★★★★ 1

\$25⁴⁴ (\$25.44/Count)

~~\$29.95~~ (15% off)

✓prime

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Satisfyer Hot Lover Rabbit Vibrator with
Warming Function and App Control -...

★★★★★ 1

\$49⁹⁵ (\$49.95/Count)

✓prime

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Satisfyer Hot Lover Rabbit Vibrator with
Warming Function and App Control -...

★★★★★ 1

\$49⁹⁴ (\$49.94/Count)

✓prime

Only 16 left in stock - order soon.

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Satisfyer Hot Lover Rabbit Vibrator with
Warming Function and App Control -...

Satisfyer Little Secret Panty Vibrator
with App Control and Wireless Remote

Satisfyer Sexy Secret Panty Vibrator with
App Control - Vibrating Clitoris

★★★★★ 1

\$49⁹⁵ (\$49.95/Count)

✓prime

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Satisfyer Twirling Joy Tip Vibrator with
App Control - Lay-on Vibrator with

\$49⁹⁵ (\$49.95/Count)

✓prime

Add to Cart

★★★★★ 9

\$50²⁸ (\$50.28/Count)

✓prime

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Satisfyer Twirling Joy Tip Vibrator with
App Control - Lay-on Vibrator with

\$49⁹⁵ (\$49.95/Count)

✓prime

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★★★★★ 22

\$39⁸⁹ (\$39.89/Count)

✓prime

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Satisfyer Twirling Joy Tip Vibrator with
App Control - Lay-on Vibrator with

\$49⁹⁵ (\$49.95/Count)

✓prime

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Satisfyer Teaser Finger Vibrator - 12
Vibration Programs for Stimulation of

★★★★★ 2

\$29⁷⁹ (\$29.79/Count)

✓prime

Add to Cart



Satisfyer Teaser Finger Vibrator - 12
Vibration Programs for Stimulation of

★★★★★ 2

\$28⁹⁹ (\$28.99/Count)

✓prime

Add to Cart



Satisfyer Twirling Fun Tip Vibrator - Lay-
on Vibrator with Circulating Tip for

★★★★★ 1

\$39⁴⁸ (\$39.48/Count)

✓prime

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Satisfyer Twirling Fun Tip Vibrator - Lay-
on Vibrator with Circulating Tip for

★★★★★ 1

\$39⁵⁸ (\$39.58/Count)

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Satisfyer Twirling Fun Tip Vibrator - Lay-
on Vibrator with Circulating Tip for

★★★★★ 1

\$33⁸⁴ (\$33.84/Count)

~~\$39.95~~ (15% off)

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Satisfyer Ultra Power Bullet 1 Mini Bullet
Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁵ (\$19.95/Count)

✓prime

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Satisfyer Ultra Power Bullet 1 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁴ (\$19.94/Count)

✓prime

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Satisfyer Ultra Power Bullet 2 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁵ (\$19.95/Count)

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Satisfyer Ultra Power Bullet 2 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁵ (\$19.95/Count)

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Satisfyer Ultra Power Bullet 3 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁴ (\$19.94/Count)

✓prime

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Satisfyer Ultra Power Bullet 3 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁴ (\$19.94/Count)

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Satisfyer Ultra Power Bullet 4 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$19⁹⁵ (\$19.95/Count)

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Satisfyer Ultra Power Bullet 5 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$29⁹⁵ (\$29.95/Count)

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Satisfyer Ultra Power Bullet 5 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$29⁹⁵ (\$29.95/Count)

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Satisfyer Ultra Power Bullet 5 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$29⁹⁵ (\$29.95/Count)

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Satisfyer Ultra Power Bullet 6 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$29⁹⁵ (\$29.95/Count)

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Only 18 left in stock - order soon.

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Satisfyer Ultra Power Bullet 6 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

\$29⁹⁵ (\$29.95/Count)

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Satisfyer Ultra Power Bullet 7 Mini Bullet Vibrator - Clitoral Stimulator, Personal...

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\$29⁹⁵ (\$29.95/Count)



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Satisfyer Ultra Power Bullet 8 Mini Bullet Vibrator with App Control - Clitoral...

\$29⁹⁵ (\$29.95/Count)



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Satisfyer Ultra Power Bullet 8 Mini Bullet Vibrator with App Control - Clitoral...

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6pm
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Books, art & collectibles

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Everything For Your Business

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Groceries & More Right To Your Door

AmazonGlobal
Ship Orders Internationally

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Experienced Pros Happiness Guarantee

Amazon Ignite
Sell your original Digital Educational Resources

Amazon Web Services
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Amazon Warehouse Great Deals on Quality Used Products	Whole Foods Market America's Healthiest Grocery Store	Woot! Deals and Shenanigans	Zappos Shoes & Clothing	Ring Smart Home Security Systems	eero WiFi Stream 4K Video in Every Room	Blink Smart Security for Every Home
	Neighbors App Real-Time Crime & Safety Alerts	Amazon Subscription Boxes Top subscription boxes – right to your door	PillPack Pharmacy Simplified	Amazon Renewed Like-new products you can trust	Amazon Second Chance Pass it on, trade it in, give it a second life	
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Satisfyer Anal Plugs 3 Piece Set - Butt Plug, Anal Dildo, 3 Different Structures, Soft Silicone, Increasing Diameter, Retaining Ring - Ideal for...

★★★★★ 143

Color (2):
Pink/Purple



\$11⁹² (\$3.97/Count) ~~\$14.95~~ (20% off)

prime

Get it by Sunday, December 12.

- FLEXIBLE & SMOOTH - The Satisfyer Anal Plugs are flexible and made of medical-grade silicone, caressing you with a soft-to-the-touch surface.
 - PERFECT FOR BEGINNERS & ANAL TRAINING - Thanks to the narrow tips and smooth,
- Show more

See all details

Add to Cart

Sold by EIS-Inc. and Fulfilled by Amazon.

Satisfyer Love Beads - Anal Beads 2 Piece Set - Anal Chain, 2 Different Structures, Soft Silicone, Increasing Diameter, Retaining Strap - Ideal for...

★★★★★ 17

Color (2):
Black



\$14⁹⁵ (\$14.95/Count)

prime

Only 9 left in stock - order soon.

Get it by Sunday, December 12.

- SOFT & SMOOTH - Made of skin-friendly, super-soft medical grade silicone, the Satisfyer Love Beads provide a friction-free in-and-out.
 - 2 SENSUAL STRUCTURES - Whether you opt for the classic ball shape or dare to try out
- Show more

See all details

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Sold by EIS-Inc. and Fulfilled by Amazon.



Satisfyer Lolli-Plug 1 Anal Vibrator - Vibrating Anal Plug, Diamond Shaped

★★★★★ 1

\$29⁹⁴ (\$29.94/Count)

✓prime

Add to Cart



Satisfyer Lolli-Plug 1 Anal Vibrator - Vibrating Anal Plug, Diamond Shaped

★★★★★ 1

\$29⁸⁹ (\$29.89/Count)

✓prime

Add to Cart



Satisfyer Lolli-Plug 2 Anal Vibrator - Vibrating Anal Plug, Round Shaped

★★★★★ 3

\$18⁸³ (\$18.83/Count)

✓prime

Only 10 left in stock - order soon.

Add to Cart



Satisfyer Lolli-Plug 2 Anal Vibrator - Vibrating Anal Plug, Round Shaped

★★★★★ 3

\$27⁹⁵ (\$27.95/Count)

✓prime

Only 19 left in stock - order soon.

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Satisfyer Plug-ilicious 1 Anal Vibrator with App Control - Vibrating Anal Plug,

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★★★★★ 1

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Satisfyer Power Balls - Kegel Ball
Exercise Weights, Ben Wa Balls,
Pelvic Floor Training, Tightening,
Ideal for Beginners, 3-Piece Set
(2.11 - 3.23 oz.)

★★★★★ 53

Size (3):

Power Balls (2.11-3.... >

\$29⁹⁵ (\$9.98/Count)

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Only 11 left in stock - order soon.

Get it by Sunday, December 12.

- ULTIMATE ORGASM TRAINING - Wearing the Satisfyer Kegel Balls for just 15 minutes a day trains your pelvic floor muscles - the muscles that enable you to experience breathtaking

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Satisfyer Strengthening Balls -
Kegel Ball Exercise Weights, Ben Wa
Balls, Pelvic Floor Training,
Tightening, Ideal for Beginners,
3-Piece Set (2.18...

★★★★★ 31

Size (3):
Single Fixed (2.18-3... >

\$14⁹⁵ (\$4.98/Count)



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Satisfyer V Balls - Kegel Ball
Exercise Weights, Ben Wa Balls,
Pelvic Floor Training, Tightening,
Ideal for Beginners, 3-Piece Set
(2.79-5.30 oz.)

★★★★★ 65

Size (3):
Double Fixed (2.79-... >

\$**24**⁹⁵ (\$8.32/Count)



Get it by Sunday, December 12.

- ULTIMATE ORGASM TRAINING - Wearing the Satisfyer Kegel Balls for just 15 minutes a day trains your pelvic floor muscles - the muscles that enable you to experience breathtaking

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With Free Satisfyer Connect App - Bluetooth & App Control

~~\$49.99~~ **\$49.88** (Count)





Satisfyer Double Fun (White)

With Free Satisfyer Connect App - Bluetooth & App Control

~~\$49.99~~ **\$49.88** (Count)





Satisfyer Double Joy with App (Violet)

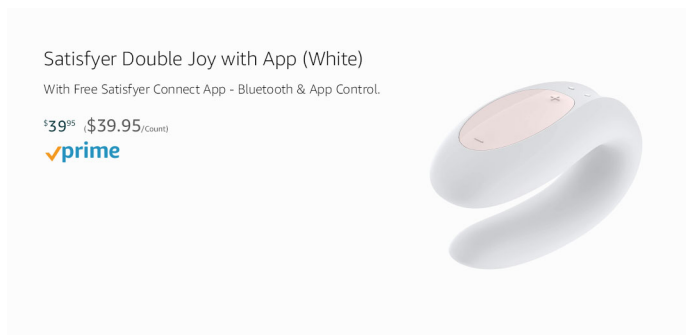
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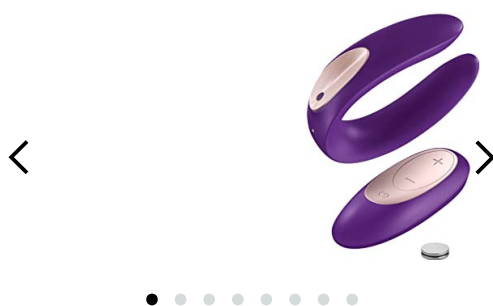


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Satisfyer Double Joy with App (White)
With Free Satisfyer Connect App - Bluetooth & App Control.
\$39⁹⁵ \$39.95/Count
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Satisfyer Double Plus Couples
Vibrator with Remote Control -
G-Spot and Clitoral Stimulation,
Partner Toy, U-Shape, Wearable
During...

★★★★★ 1,080

Color (4):
Partner Plus ...

\$35⁰³ (\$35.03/Count)
prime

Get it by Sunday, December 12.

- G-SPOT & CLITORAL STIMULATION - Double Plus has a U-shaped design and a wider diameter than its predecessor. With a powerful motor in each shaft, one lies on your clitoris,

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Satisfyer Luxury Double Love Couples
Vibrator with App Control and Wireless...

★ ★ ★ ★ ★ 1

\$58⁰³ (\$58.03/Count)

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Satisfyer Luxury Double Love Couples
Vibrator with App Control and Wireless...

★ ★ ★ ★ ★ 1

\$57⁹⁷ (\$57.97/Count)

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Satisfyer Luxury Double Love Couples
Vibrator with App Control and Wireless...

★ ★ ★ ★ ★ 1

\$57⁹⁷ (\$57.97/Count)

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Satisfyer Double Whale Couples Vibrator
- G-Spot and Clitoral Stimulation,

★ ★ ★ ★ ★ 1,080

\$29⁹⁵ (\$29.95/Count)

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Satisfyer Double Plus Couples Vibrator -
G-Spot and Clitoral Stimulation,

★ ★ ★ ★ ★ 1,080

\$29¹⁴ (\$29.14/Count)

~~\$39.95~~ (27% off)

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Satisfyer Double Classic Couples Vibrator
- G-Spot and Clitoral Stimulation,

★ ★ ★ ★ ★ 1,080

\$19⁹⁴ (\$19.94/Count)

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Satisfyer Endless Fun Couple's Vibrator - Multivibrator, Clitoral and G-Spot Stimulation, Partner Toy, Soft Silicone, Rotatable Head,...

★★★★★ 170

Color (3):
Blue 

\$49⁹⁵ (\$49.95/Count)

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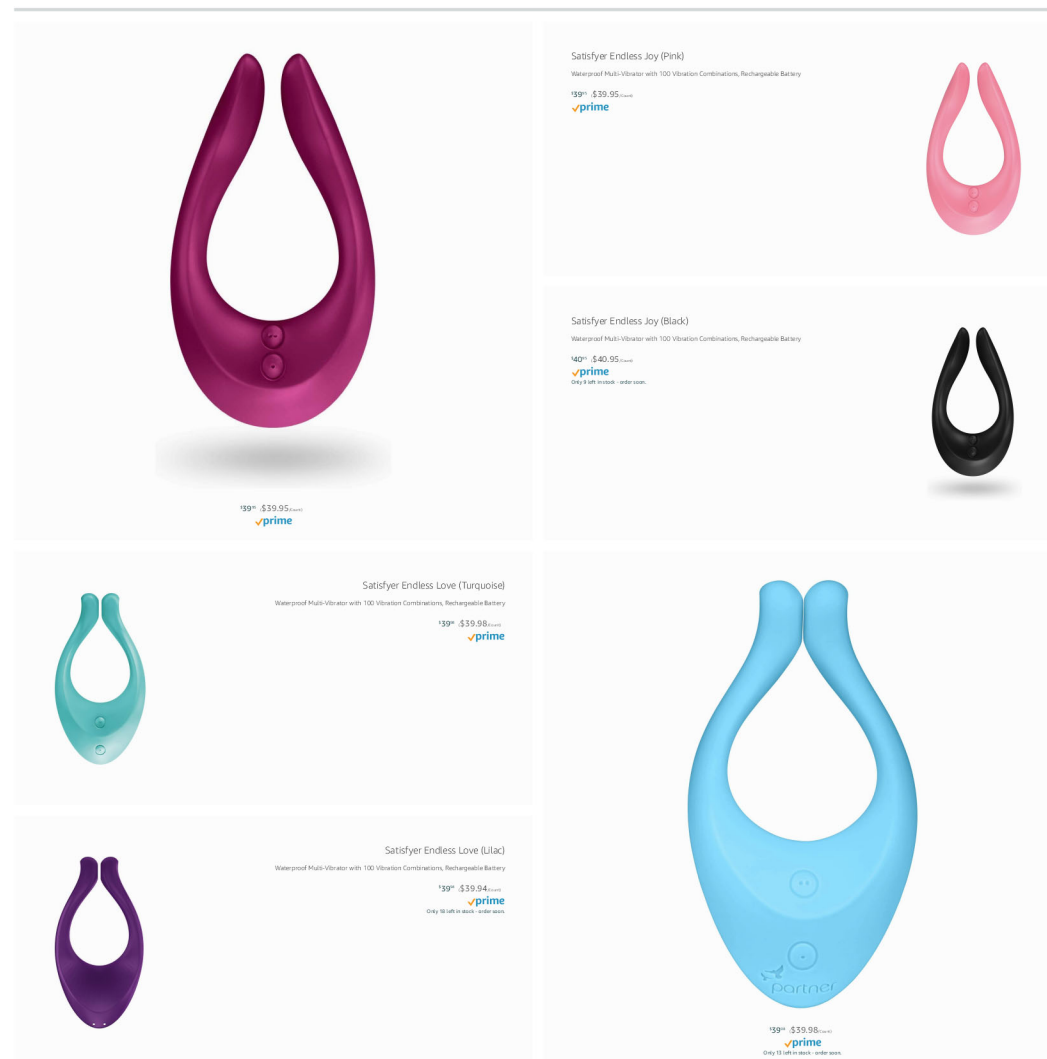
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- 180-DEGREE ROTATABLE HEAD - The moveable head of the Endless Fun can be rotated 180 degrees, meaning you can include this versatile sex toy in all your games and every position!
 - 100 VIBRATION COMBINATIONS - Each of the 10 vibration settings in the two arms can be controlled
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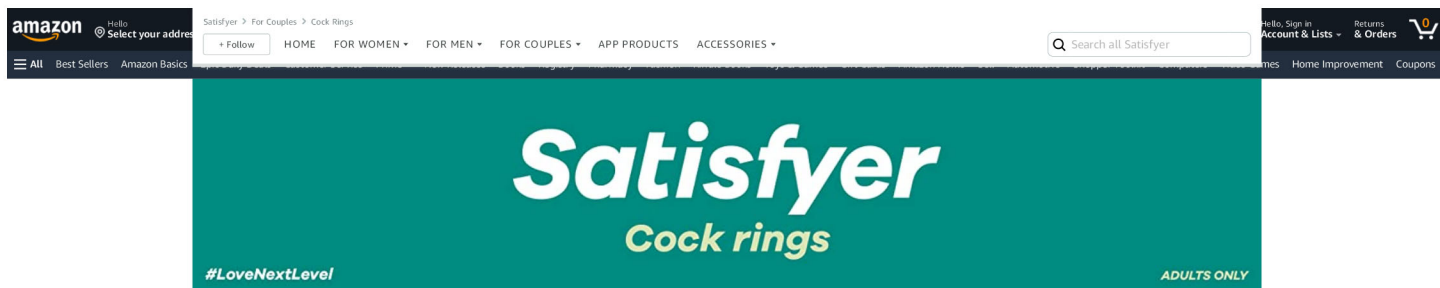
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Satisfyer Power Ring Cock Ring - Vibrating Penis Ring for Longer, Harder, Stronger Erections, Erection Enhancing Penis Ring Plus Vibration - ...

★★★★★ 398

\$29⁹⁵ (\$29.95/Count)

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In stock soon.

- 10 INTENSE VIBRATION SETTINGS - With 10 stimulating vibration settings, the Satisfyer Power Ring gives your manhood a sensual upgrade, ensuring you and your partner enjoy a tingling pleasure.
- INCREASES STAMINA - The flexible cock ring nestles itself snugly and sexily against your penis. And

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Satisfyer Signet Ring Vibrating Cock Ring with App Control - Vibration Silicone Penis Ring for Longer, Harder, Stronger Erections - Compatible with...

★★★★★ 1

\$29⁹⁵ (\$29.95/Count) (25% off)

prime

Only 5 left in stock - order soon.

Get it by Sunday, December 12.

- 10 BUILT-IN VIBRATION SETTINGS - With 10 built-in vibration settings, the Satisfyer Signet Ring gives your manhood a sensual upgrade, ensuring you and your partner enjoy a tingling pleasure.
- FREE APP CONTROL - With the free Satisfyer Connect App, available for iOS and Android, turn your

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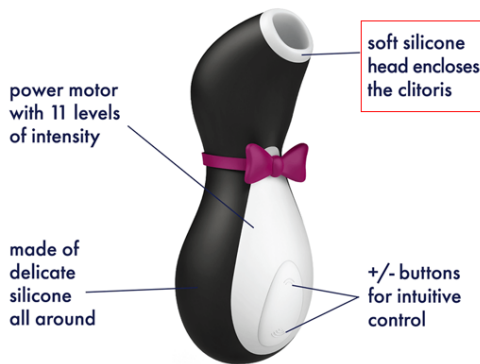
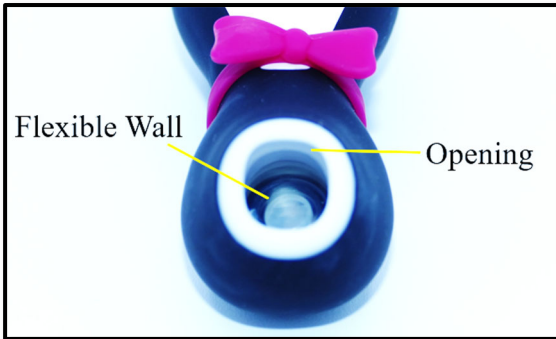
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EXHIBIT 3

Claim Language of the '220 Patent	Satisfyer Penguin Air Pulse Stimulator
<p>an opening configured to sealingly engage a portion of a body of a user including a clitoris, the modulated positive and negative pressures to be applied to the portion of the body via the opening, the opening being a sole opening of the chamber to an exterior of the stimulation device, the flexible wall to sealingly separate the drive unit from the portion of the body;</p>	<p>Satisfyer Penguin Air Pulse Stimulator Product Packaging Inserts Describing “Use”:</p>  <p>Accused Product Annotated “Product Features” on Satisfyer’s Website¹:</p> <p>PRODUCT FEATURES</p>  <p>Accused Product Annotated Photograph Showing Opening is Sole Opening of Chamber to Exterior of Device:</p> 

¹ (available at <https://us.satisfyer.com/us/products/air-pulse-technology/air-pulse-stimulators/penguin/>).

EXHIBIT 4

WO2015/039787

PCT/EP2014/065734

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Description**Stimulation Device**

5

The present invention relates to a stimulation device for erogenous zones, in particular for the clitoris, a system with a stimulation device, as well as to methods for stimulating body parts.

10

The erogenous zones of the human body can be stimulated with a variety of tools. For example, vibrators are used to apply a stimulus to a particular area of the skin by direct contact. However, this form of stimulation can lead to irritations or inflammations of the skin. Also, direct contact of the genital area with such tools for individual reasons of hygiene or due to personal reservations, for example, may not be desired.

15

In particular, the direct stimulation of the clitoris with a clitoral massage vibrator, for example, is fraught with problems, as the clitoris is usually a woman's most sensitive erogenous zone. The entire clitoris is equipped with numerous nerve endings, thus making it particularly touch-sensitive and responsive to sexual stimuli. Here, the clitoris glans, in which the nerve cords of the two thighs meet, should be particularly emphasized. Frequent use of a clitoral massage vibrator for direct stimulation, for example, leads to habituation effects or conditioning of the stimulated erogenous zone and the initial use of such a device may require certain practice or familiarization.

20

25

Furthermore, medical studies conducted in 2006 determined the female clitoris as definitive starting point of the female climax and neurologically proved the different qualities of sensation of clitoral (and vaginal) orgasm for the first time. Thus, according to the most recent medical research, the stimulation of the

30

WO2015/039787

PCT/EP2014/065734

- 2/32 -

clitoris, rather than the vagina, is considered the starting point of a woman's sexual arousal and thereby the key to female "sexual pleasure".

The sensitivity of the human erogenous zones, such as the clitoris, the inner
5 and outer labia or the nipples, continues to differ greatly individually. The person
may be so sensitive that direct stimulation is only possible after prolonged
foreplay, and even then only very subtly or ruled out completely. Furthermore, the
sensitivity of the corresponding zone can change dramatically from one situation
to another or even during a sexual act.

10

For the aforementioned reasons, various indirect forms of stimulation are
common practice as alternatives to direct stimulation.

For indirect stimulation of erogenous zones, and especially the clitoris,
15 conventional vacuum devices are used to arouse the erogenous zones of the person
concerned without directly contacting the main area to be stimulated. Thus, for
example, vacuum pumps for the primary or secondary female sexual organs are
known, which usually have a suction cup for placing on the appropriate area and a
hand pump. The negative-pressure exerted by this type of device on the clitoris, for
20 example, generates a negative pressure in the clitoris itself, which is usually lower
than the systolic blood pressure. This difference in pressure leads to an
enlargement of the clitoris and/or stimulates the blood flow in the affected area.
This vascular clitoral engorgement serves both to promote desire by increasing
sensitivity and for optical and tactile manipulation. The improved blood circulation
25 also leads to an increased leakage of vaginal moisture which makes the stimulation
more pleasurable. However, the manual operation of the hand pump is often
annoying or distracting. In addition, the long-term or uninterrupted use of
negative-pressure in this device category may lead to habituation effects, which
limit the effectiveness of the device in the long run. Moreover, a pure increase in
30 the clitoral blood flow is often insufficient to reach a climax; vacuum pumps are

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thus often used only as foreplay to achieve the climax with a subsequent direct (pressure) massage of the erogenous zone.

Electrically driven vacuum pumps are also used increasingly instead of manually operated vacuum pumps as well. As an example of this, WO 2006 / 05 82 91 A2 discloses a device for sexual therapy, wherein the arrangement consists of a tubular suction chamber for the clitoris, an electric vacuum source (vacuum pump) and a plurality of airflow openings. The operation of the vacuum pump generates a permanent airflow or air exchange in the chamber in the area of the clitoris. This has the disadvantageous effect of suctioning the increasingly leaking vaginal moisture caused by the negative-pressure, thus having a drying effect on the stimulated parts of skin. Likewise, the suctioned moist air leads to a contamination of the fluidic subsequent vacuum arrangement, of the vacuum pump for example. Such arrangements with vacuum pumps may thus be hygienically problematic, as vacuum pumps and the associated valves or ventilation components often have dead spaces or blind spots and/or are difficult to clean. Furthermore, the device is meant to treat the blood vessels in the clitoris and not to provide stimulation up to sexual climax.

US 6 099 463 A discloses a clitoris stimulation device with a tubular suction chamber, a vacuum source or a vacuum pump and a plurality of valves, which are used to control the size of the vacuum. The vacuum can also be in cyclic form to achieve a stimulation effect, although habituation effects are also to be expected with this device due to the use of a permanent vacuum. As explained above, the disadvantages relating to hygiene and the dehydration of the skin part to be stimulated are also present here. Likewise, the pressure-related arrangement with a plurality of valves, vacuum pump, etc. is relatively complex.

US 6 464 653 B1 discloses therapeutic devices and methods to generate a clitoral engorgement with the aid of a vacuum generated by a vacuum pump to

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assist in the treatment of clitoral disorders, such as incontinence. A control valve or modulator that can be correspondingly covered by a finger is used to manually adjust or vary the amount of vacuum in the suction chamber. This requires the user's attention and may be distracting or diverting under certain circumstances.

5 This relatively complex device with additional valves also has the same disadvantages relating to hygiene and dehydration as explained above, although the device is also used for long-term therapeutic purposes and not for short-term sexual stimulation.

10 WO 2008 / 02 80 76 A2 discloses a therapeutic device for women, which is mainly dedicated to treating sexual disorders. The device includes a combination of indirect stimulation by means of a vacuum chamber and direct stimulation by means of mechanical vibrators and oscillators.

15 The negative-pressure in this therapeutic device is used to increase the blood flow in the clitoris, while the area of skin is actually stimulated or massaged by means of direct mechanical vibrations/oscillations. Thus, a suction cup for placing on the area of skin to be stimulated is internally connected with a motor via a mechanical connection. The suction cup is extended by the motor once the device
20 is activated, thus increasing the volume of the suction cup. The resulting volume of the suction cup and thus the strength of the vacuum can be adjusted by means of control elements on the device. The air displaced in the device by the suction process is discharged outwardly again via a pipe. The vacuum in this device has only a supporting function, while the actual stimulation ensues directly, which also
25 entails the same disadvantages of a direct stimulation as explained above.

US 2013 / 001 276 9 A1 discloses a device in which a pulsating positive-pressure is used for stimulating an air pressure massage. A pump or compressor thus generates a pulsating positive-pressure, which is directed towards the
30 erogenous zone to be stimulated by means of a nozzle. This device

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disadvantageously causes the affected area of skin to dry out severely or completely. Likewise, there is usually a temperature difference between the temperature of the supplied air and the temperature of the area of skin to be stimulated, which may be felt to be distracting under certain circumstances. The
5 same problems of hygiene as explained above also occur in this device, although in this case any pathogens or germs or other contaminations located in the device are also transported directly to the user's genital area.

Thus, the prior art devices all have the same disadvantage in common, in that
10 the complexity of the arrangements generating negative-pressure or positive-pressure may be high and this device may have problems of hygiene.

Furthermore, the prior art devices have another disadvantage in common, in that habituation effects occur in the event of constant or frequently recurring use of
15 negative-pressures.

Another disadvantage of some of the previously described vacuum devices is, firstly, that the negative-pressure has to be limited by means of a control valve or a vacuum pump and, secondly, that the negative-pressure is supposed to be
20 reduced by means of a manual opening of a release valve, before the suction cup is peeled from the skin. Should one of the valves have a technical defect and/or the user operate the device incorrectly, there may be a risk of injury in certain circumstances.

25 Thus, in view of the problems as explained above, the problem addressed by the invention is to provide a stimulation device with a simple construction that is easy and safe to use.

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Another problem addressed by the present invention is to provide a stimulation device with an effective stimulation-triggering effect, which is suitable for stimulating an erogenous zone, especially the female clitoris.

5 In addition, partial problems addressed by the invention are to provide a device, which prevents the erogenous zones to be stimulated from drying out, is hygienic and prevents habituation effects.

The problem addressed by the invention is solved by the stimulation device
10 according to claim 1. Advantageous developments and embodiments are the subject-matter of other alternative independent claims and dependent claims.

According to the invention, a pressure field generator in the stimulation device has at least one first chamber and at least one second chamber with at least
15 one opening for placing on a body part or on the erogenous zone and at least one connection element that connects the first chamber with the second chamber.

This embodiment of chambers according to the invention communicating in a fluidic manner via at least one connection element allows the first chamber to
20 simply generate a pressure field in the second chamber by modifying the volume in the first chamber, which is occasionally directed at the area of skin to be stimulated.

A pressure field in terms of the invention is a temporally modifiable field of
25 media pressures, with occasional positive-pressures and occasional negative-pressures, a negative-pressure being a media pressure below the reference pressure and an positive-pressure being a media pressure above the reference pressure.

The medium is usually gaseous, preferably air, but may alternatively or
30 additively, for example, be a liquid medium, such as water or commercially

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available lubricant. For example, the chambers according to the invention may be filled with the lubricant prior to using the stimulation device. This allows the corresponding area of skin to be stimulated with a suitable skin-friendly liquid in lieu of air as well, whatever the user's individual preference. As another example, the stimulation device may also be used under water with water as the medium (in the bathtub, for example).

The reference pressure is usually the existing ambient pressure in relation to the stimulation device at the beginning of use (i.e. prior to placing the stimulation device on the area of skin to be stimulated). In the preferred use of the stimulation device with air, the reference pressure is the currently existing air pressure or normal pressure.

The pressure field according to the invention excites the blood circulation of the area of skin to be stimulated, while said area of skin is indirectly massaged, thus combining two advantageous effects. The increased blood circulation makes the erogenous zone of the person concerned more sensitive, while generating an additional massage effect that serves, for example, to stimulate the erogenous zone to sexual arousal up to climax. The massage effect is generated by the kinetic energy of the medium flowing out of the first chamber through the connection element against the surface of the area of skin to be stimulated. The massage effect generated in this way is indirect, i.e. without the area of skin to be stimulated being contacted by a solid body, such as a vibrator, which results in the avoidance of the initially explained disadvantages of direct stimulation.

25

By the exemplary use of the temporally modifiable pressure field according to the invention on the clitoris, the pressure field imitates a stimulation that usually only occurs during sexual intercourse. Likewise, the cohabitation movement generates a varying stimulus on the clitoris. It is thus a true-to-life imitation of the natural act of cohabitation, with medical statements confirming that the use of the

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pressure field according to the invention causes neither habituation effects nor addiction. This is due in particular to the alternating use of negative- and positive-pressures (or even to the non-continuous use of only one type of pressure).

5 Furthermore, the maximum applicable pressure is regularly limited by the maximum resilience of the area of skin to be stimulated. Thus, for instance, too high a negative-pressure harbors the risk of painful injury, especially in erogenous zones. Only stimulation devices working with negative-pressures are usually limited to this maximum in their mode of operation. Conversely, the combination
10 of positive- and negative-pressures according to the invention creates an extended working area of the stimulation-triggering pressure field or effect, as the working area of the pressure can now be exploited to the maximum in both the positive and negative area.

15 The orientation of the at least one connection element towards the area of skin to be stimulated allows the pressure field to work directly, wherein the pressure field is decisively influenced by the configuration of the at least one connection element and of the at least one opening from the connection element into the second chamber, and is thus adjustable after every use of the stimulation
20 device. Thus, for example, the at least one opening of the connection element may be located opposite and preferably directly opposite the body part to be stimulated. For example, the connection element in a stimulation device intended for the clitoris may have a single passageway with nozzle effect on the clitoris glans between the first and second chamber. Alternatively, the at least one connection
25 element may consist of a plurality, for example four, of passageways between the chambers, if a larger area of skin is to be stimulated.

 Furthermore, after placing the halfway or partially opened second chamber on the area of skin to be stimulated, a self-contained system of media- and airflow
30 is created in the pressure field generator. Thus, for instance, the medium or air is

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5 moved decisively backwards and forwards between the chambers, while an interchange with media or with air from outside the system being at least largely avoidable. Thus, the first chamber is preferably connected exclusively with the second chamber via or through the connection element. Thus, no first chamber connections other than those to the second chamber exist; for example, there is no direct first chamber connection to the environment of the device via a pressure valve or via an air discharge channel.

10 For example, the air temperature in the flow system according to the invention rapidly adjusts to the skin temperature, while the distracting supply of new (possibly cold) air from outside the system is avoided, as may be the case , inter alia, when using vacuum pumps in prior art. Drying effects are also avoided, as very little or no removal of stimulation-promoting fluid, such as bodily fluid, occurs in a closed system.

15

Furthermore, due to the simple construction, the pressure field generator according to the invention has the advantage of increased hygiene and improved cleanability. The present invention thus avoids valves or pumps/compressors with potential dead spaces and places that cannot be cleaned. The pressure field generator according to the invention is thus easy to clean. For example, the stimulation device can be simply cleaned by filling the first chamber with a cleaning agent and activating the pressure field. Alternatively, the second chamber can be arranged to be replaceable, which also simplifies the cleaning of both chambers. Furthermore, the chambers according to the invention and the connection element of the pressure field generator can be designed in one-piece, wherein the latter consists of a single molded plastic part (e.g. rubber).

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In addition, the construction according to the invention avoids complex fluidic elements, such as valves, which leads to a simplification in production.

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Furthermore, the stimulation device according to the invention has a drive unit, which modifies the volume in the first chamber in such a way that a pressure field is generated via the connection element in the second chamber that serves to stimulate the erogenous zone, and has a control device that activates the drive unit.

5

As a matter of principle, the medium transported between the chambers is limited to the maximum volume of the first chamber. In addition, the transported volume can be further constructively limited by the maximum possible volume modification caused by the drive unit.

10

This means that the maximum positive- or negative-pressure the stimulation device can build up in the second chamber is limited due to the dimensioning of the components of the pressure field generator and of the drive. In particular, the maximum positive- or negative-pressure can be limited to degree that minimizes or excludes any risk of injury for the areas of skin to be stimulated. As a result, any conventional safety valve in prior art or any manual intervention in the stimulation process by the user, such as the opening of a release valve, is rendered unnecessary.

15

20

Furthermore, the temporal modification of the pressure field or the modification of the pressure field by the control device is automatically controlled to a large extent. Thus, for example, the modulation of the pressure field, such as intensity, chronological sequence or evolvment, can be pre-saved in the control device. As a preference, the temporal modification of the pressure field can have a regular or reoccurring (stimulation) pattern, such as impulses with a stipulated cycle or regularly alternating impulse sequences. This allows the user's interaction with the stimulation device according to the invention to be limited to switching on and off and selecting the stimulation pattern, while the stimulation device automatically executes the preferred stimulation pattern. Thus, according to the invention, the user complexity of the stimulation device is low, especially when

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compared with conventional (medical) vacuum stimulation devices. Alternatively, or additionally, the simulation pattern of the stimulation device can be individually configured by the user during or before operation.

5 Another aspect of the invention proposes a system according to alternative independent claim 14 with the stimulation device according to the invention, which has a remote control device arranged separately from the stimulation device, wherein the control device of the stimulation device is remotely controlled by the remote control device. This allows a conventional wireless (via radio for example)
10 or wired remote control to be employed, in order to allow the remote controlled moderation of the stimulation device or the activation thereof by another user.

Another aspect of the invention proposes a method according to alternative independent claims 15 and 18 for stimulating body parts, especially the clitoris.
15 The associated advantages effects and impacts are explained in more detail above in relation to the pressure field.

Another aspect of the invention according to claim 19 proposes the use of the stimulation device according to the invention as a sex toy for stimulating the
20 female clitoris. As explained at the beginning, the female clitoris is an especially erogenous zone of women, which is why the use according to the invention of an indirect massage combined with a negative-pressure stimulation for this body part to provide stimulation up to orgasm seems particularly advantageous.

25 The above-described features and functions of the present invention as well as other aspects and features are further described in the following with the aid of a detailed description of preferred embodiments with reference to the enclosed illustrations.

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BRIEF DESCRIPTION OF DRAWINGS

The figures show in:

- 5 Fig. 1 a front view of a first embodiment of the stimulation device
 according to the invention;
- Fig. 2 a perspective side view of the first embodiment of the stimulation
 device according to the invention;
- 10 Fig. 3 a cross-section through the first embodiment of the stimulation
 device according to the invention;
- Fig. 4 a cross-section through a pressure field generator of a first aspect of
15 the present invention in the first state;
- Fig. 5 a cross-section through a pressure field generator of a first aspect of
 the present invention in the second state;
- 20 Fig. 6 a cross-section through a pressure field generator of a first aspect of
 the present invention in the third state;
- Fig. 7 a cross-section through a pressure field generator of a second aspect
 of the present invention;
- 25 Fig. 8 a cross-section through a pressure field generator of a third aspect
 of the present invention;
- Fig. 9 a cross-section through a pressure field generator of a fourth aspect
30 of the present invention;

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Fig. 10 a), b) and c) cross-sections through a pressure field generator of a fifth aspect of the present invention;

5 Fig. 11 a partial cross-section through a second embodiment of the stimulation device according to the invention;

Fig. 12 a) to f) various bottom and side views of other aspects of a second chamber of the present invention;

10

Fig. 13 a block diagram of an embodiment of the present invention;

Fig. 14 a) to d) Diagrams of various pressure modulation patterns of the present invention

15

DESCRIPTION OF PREFERRED EMBODIMENTS

With reference to Fig. 1, a front view of a first embodiment of stimulation device 1 is explained, wherein Fig. 2 shows a perspective view and Fig. 3 a cross-section of the first embodiment of stimulation device 1 according to the invention.

20

The first embodiment of stimulation device 1 is a preferably electric or small device, comprising a housing 8, a pressure field generator 2, operating elements 71, a display 72, an on/off switch 74, a socket 75, an optional battery 76 and optional lighting 9.

25

Housing 8 is preferably designed so ergonomically that it can be held comfortably in one hand and has no sharp or pointed edges. Furthermore, housing 8 may consist of plastic, such as polycarbonate (PC) or acrylonitrile butadiene styrene (ABS). In addition, the gripping areas or even the entire housing

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may be supplemented by or designed in a haptically advantageous silicone. Housing 8 is preferably designed to be at least water-resistant or splash-proof, for example protection class IP 24.

5 Operating elements 71 are used to adjust the device operating mode, i.e. to adjust the pressure field modulation pattern. Operating elements 71 can, for example, be designed as at least one pushbutton, as at least one rotary switch, or as at least one touch-sensitive switch. Furthermore, operating elements 71 can produce an optical feedback for activating light emitting diodes (LED) integrated
10 in the center of the switch, for example.

 An optional display 72 serves to inform the user of the device status and/or the setting status. Display 72 can for example be configured as a plurality of light diodes or as an LCD display. The displayed information can, for example, be the
15 charge status of an optional battery or the current setting of the modulation pattern.

 On/off switch 74 is used for activating and deactivating stimulation device 1. This on/off switch 74 can, for example, be a pushbutton, which switches stimulation device 1 on or off when held down, or a ratcheting slide switch.
20

 A socket 75 is used to supply the external power of stimulation device 1 via an external plug 73, which is connected to an external power adapter, for example. To ensure stimulation device 1 is splash-proof, a magnetic-inductive transformer may be provided instead of the socket, which allows power to be transmitted to
25 stimulation device 1 without any electroconductive contact. Stimulation device 1 preferably also has a battery, such as a nickel metal hydride battery (NiMH) for wireless operation. Alternatively, a (longer) power supply cable may also be led out of the stimulation device.

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Pressure field generator 2 of a first embodiment has a first chamber 3 in the interior of stimulation device 1, a second chamber 4 for placing on a body part 11 to be stimulated, and a connection element 5, which connects the first chamber 3 with the second chamber 4.

5

A drive unit 6, such as an electric motor, drives the first chamber 3 via an axis 61 and by means of an eccentric 62 (or alternatively by means of a connecting rod) in such a way that the volume of the first chamber 3 is modified according to the rotation of axis 61 of drive unit 6. It is hereby annotated that any drive types causing a deflection in wall 31 of the first chamber 3 for volume modification can basically be used in stimulation device 1. The latter may, for example, occur hydraulically, pneumatically, piezoelectrically, mechanically or electromagnetically. Examples of this are described in more detail later on.

15 A control device 7 activates drive unit 6, operating elements 71 and display 72. Control device 7 and drive unit 6 are supplied with power by internal battery 76 and/or external power supply 73.

20 Optional lighting 9 is provided on or in housing 8. Lighting 9 is preferably used for lighting the interior of the second chamber 4. Lighting 9 can either be switched by the user or automatically activated by activating stimulation device 1. Furthermore, lighting 9 can be composed of energy-saving light diodes. The lighting can, for example, serve as an orientation aid in the dark for the user of stimulation device 1 or as additional optical stimulation.

25

With reference to Fig. 4, 5 and 6, the construction and function of a first aspect of pressure field generator 2 of stimulation device 1 is subsequently described in more detail.

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Fig. 4 shows pressure field generator 2 in a first state, with the second chamber 4 being placed on the area of skin or body part 11 to be stimulated. The first state of pressure field generator 2 is characterized by a neutral deflection of the first chamber 3, i.e. no external force is exerted on the first chamber 3, for example, by the drive unit. Here, volume V1 of the first chamber is the standard volume of this chamber 3.

The body part 11 to be stimulated is an area of skin on the body, wherein for example an especially sensitive erogenous zone, clitoris 12, is shown. The use of the present invention is thus not limited to the female clitoris 11, instead stimulation device 1 can be used on all body parts or erogenous zones (such as the inside of the upper thighs, the loins, neck, nipples, etc.), which can be stimulated by means of media- or air-pressure massage and/or negative-pressure.

Due to being placed on the body part 11 to be stimulated, the second chamber 4 forms a chamber largely or completely sealed off from the exterior of pressure field generator 2, which is only still connected to the second chamber via connection element 5, wherein the edges of chamber 4 ideally form an air-tight bond with the surface of body part 11. Two communicating chambers 3 and 4 are created in this way, wherein corresponding pressure equalization via connection element 5 ensues between chambers 3 and 4 in the event of a volume modification in one of chambers 3 or 4.

Wall 31 of the first chamber 3 is secured by means of a holder 32. Holder 32 is in turn attached to housing 8. Wall 41 of the second chamber is further affixed to holder 32. Two mutually aligned openings in wall 41 of the second chamber and of holder 32 jointly form connection element 5, which connects the first chamber 3 and the second chamber 5. Wall 31, holder 32 and wall 41 are preferably adhered to each other media- or air-tightly. Alternatively, the latter can also be press-fitted or screwed together with each other (for example by means of sealing areas

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between housing 8 and the respective part). Holder 32 can also be adhered or screwed onto housing 8, for example.

5 Wall 31 of the first chamber 3 preferably consists of a flexible media- or airtight material, such as rubber. Holder 32 preferably consists of a rigid plastic, which is just as media- and airtight. Wall 41 of the second chamber is preferably made of a flexible, skin-friendly material, such as silicone or rubber.

10 Fig. 5 shows pressure field generator 2 of Fig. 4 in a second state, wherein the second chamber 4 is in turn placed on the body part 11 to be stimulated. The second state is characterized in that a force A affecting the first chamber 3 causes chamber 3 to expand. In detail, force A in this embodiment draws wall 31 of the first chamber 3 in a direction facing away from the second chamber 4.

15 Volume V_2 in chamber 3 increases as a result, i.e., $V_2 > V_1$. To equalize the difference in pressure created between chambers 3 and 4, the media or air now flows from the second chamber 4 into the first chamber 3.

20 Assuming that the first state of the present pressure in chambers 3 and 4 corresponds to the currently prevailing external reference pressure (air pressure for example); the present overall pressure in the second state will now be less than the external reference pressure. This negative-pressure is designed in such a way that it is preferably less than the usual systolic blood pressure in the blood vessels of body part 11. The blood circulation in this area thus increases and clitoris 12 is
25 better supplied with blood in the second state.

30 Fig. 6 shows pressure field generator 2 in a third state, wherein the second chamber 4 is in turn placed on the body part 11 to be stimulated. The third state is characterized in that a force B influencing the first chamber 3 causes a volume reduction or compression in chamber 3. In detail, the direction of force B is

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opposed to the direction of force A and distorts wall 31 of the first chamber in such a way that the resulting volume V3 of the chamber is less than volume V1. The compression of chamber 3 causes an positive-pressure in chamber 3, which is equalized by a media- or airflow through connection element 5 in the direction of
5 the second chamber 4.

This media flow is now preferably directed by the orientation of opening 51 and/or of connection element 5 towards the body part 11 to be stimulated, in particular towards the glans of clitoris 12. The indirect (pressure) massage
10 according to the invention ensues due to the medium flowing onto body part 11. The size of opening 51 is dimensioned in such a way that it is small enough in ratio to the volume displaced in the first chamber 3 to sufficiently accelerate the medium for a perceptible massage effect.

Furthermore, the type of flow can not only be advantageously influenced by the size and orientation of opening 51, but also by the inner configuration of the connection element. For example, helix-shaped grooves in connection element 5 can cause the flow according to the invention to swirl, wherein the flow profile of the flow unfurls a “softer” or more turbulent effect on the body part to be
15 stimulated. Alternatively, the resulting pressure field in the second chamber 4 can be adjusted by means of a plurality of openings 51, depending on use.
20

The advantageous factor of the arrangement shown in Fig. 4 to 6 is that it is hygienically unproblematic (due to the avoidance of dead spaces, for example) and is simple to produce. For example, no valves or other openings in or on the first
25 chamber 3 are required.

Fig. 7 shows a second aspect of the present invention with an alternative construction of pressure field generator 2. Walls 31 and 41 of the first and second
30 chambers 3 and 4 respectively can thus engage with one another in such a way that

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they also form two communicating chambers with a connection element 5, as in the first aspect of the construction of pressure field generator 2. Thus, the separate holder is no longer required, while the second chamber 4 is replaceable. In addition, connection element 5 can be designed integrally or in one-piece with wall 41 of the second chamber 4. A replaceable chamber 4 has the advantage of allowing the use of any shapes of chamber 4 adjusted to the respective body part (a more detailed description thereof is provided later), without the entire stimulation device 1 needing to be replaced. Alternatively, the second chamber 4 can also be pluggably affixed to housing 8 (not shown in more detail). Wall 31 of the first chamber 3 can be adhered or screwed onto housing 8, for example.

Also, as shown in more detail in Fig. 7 by the broken line and double arrow C, the first chamber 3 is expanded and compressed by a force exerted perpendicularly to the axial direction of connection element 5. In principle, the force exerted directly or indirectly on the first chamber 3 by drive unit 5 can be exerted from any direction. The only decisive criterion here is that the volume of the first chamber 3 can be increased and decreased by drive unit 6.

Fig. 8 shows a third aspect of the invention with an integral or one-piece structure of pressure field generator 2. An elastic material, such as silicone or rubber, can be used as material for chambers 3 and 4. The advantage here is that any hygienically unsafe divide is avoided and the production effort is reduced. Pressure field generator 2 can be adhered or screwed onto housing 8 in this case too. Any modification of the volume in the first chamber 3 is analogous here, as described in conjunction with Fig. 7.

Fig. 9 shows a fourth aspect of the invention with an alternative construction of pressure field generator 2. The second chamber 4, a plurality of connection elements 5, as well as partial sections of wall 31 of the first chamber 3 are designed in one-piece. Alternatively, pressure field generator 2 can be constructed

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in two or more pieces from individual components, while safeguarding the geometrical example of Fig. 9 in a similar way to that shown in Fig. 4 or 7.

The volume in chamber 3 is modified in a similar way to a piston pump, although no valves are available here. A piston 63 is thus moved backwards and forwards by the drive unit, for example an electric motor or electromagnet, in the directions of the double arrow D. This type of drive has the advantage that the volume of the first chamber 3 can be simply reduced to zero or almost zero, thus allowing the first chamber 3 to be almost completely emptied.

The embodiment of connection element 5, with a plurality of channels 52 and openings 51, leads to a distribution of the pressure field to a plurality of concentration points. While the embodiment of connection element 5 with only one channel, as described in conjunction with Fig. 6, leads to the formation of a strongly concentrated media- or airflow on a target area, the embodiment of connection element 5 shown in Fig. 9 allows the media- or airflow to be distributed to a plurality of target areas, thus allowing clitoris 11 to be blown not just on its glans, but equally from a plurality of directions as well, for example,. Depending on use, this distribution of the airflow concentration to a plurality of areas can help to avoid any overstimulation and/or help to increase the stimulation area.

Fig. 10a to 10c show a fifth aspect of the invention with (partial) cross-sections of a construction of pressure field generator 2 with a bending element 64 as drive for modifying the volume in the first chamber 3. Bending element 64 can, for example, be a conventional piezoelectric bending element, which distorts or bends once voltage is applied. In this aspect of the invention wall 31 of the first chamber 3 is a rigid or stiff construction, while bending element 64 is suitably dovetailed to the sides of the first chamber 3. The transition points between bending element 64 and wall 31 are sealed (elastically bonded for example). The

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drive for pressure field generator 2 is already integrated in this construction and an external drive is not required. An electric motor with an eccentric is not needed, for example. This allows, inter alia, the reduction of any disturbing natural oscillations due to the eccentric movement of the stimulation device.

5

In detail, Fig. 10a shows pressure field generator 2 with bending element 64 in a neutral position. Thus, the volume of the first chamber 3 with bending element 64 in the neutral position is the standard volume. Fig. 10b also shows the first chamber 3 with an excited and, consequently, outwardly bent bending element, while the volume of the first chamber 3 is increased, with a negative-pressure consequently prevailing in pressure field generator 2. Fig. 10c shows a bending element of the first chamber 3 excited in the opposite direction to Fig. 10b, which is why the volume in the first chamber 3 has decreased, with an positive-pressure consequently prevailing in pressure field generator 2.

15

Fig. 11 shows a second embodiment of the invention with a locally separated arrangement of chambers 3 and 4 of pressure field generator 2. Chambers 3 and 4 are connected via an extended connection element 5, which can be a longer flexible hose or even a rigid pipe. For example, connection element 5 may be 0.5m in length. This enables housing 8 to be held in one hand, while the other hand holds the second chamber 4 on the body part 11 to be stimulated; or one can simply lay housing 8 aside, while the user holds only the second chamber 4 in his/her hands. The stimulation device in this embodiment can also be designed as a table device.

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Fig. 12 a) to 12 f) show various bottom and side views of other aspects of the second chamber 4 of the present invention. In detail, Fig. 12 a) shows a bottom view of a circular second chamber 4 with a centrally arranged opening 51; Fig. 12 b) a bottom view of a triangular second chamber 4 with a centrally arranged opening 51; Fig. 12 c) a bottom view of an oval second chamber 4 with a centrally

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arranged opening 51; and Fig. 12 d) a bottom view of an almost eight-shaped second chamber 4 with two openings 51 shifted to the center. Fig. 12 e) further shows a side cross-section of a second chamber 4 according to the invention, wherein the second chamber 4 has an additional extended contact surface 43 to the skin or a support part 43 to improve the sealing function of the second chamber 4 on the skin. The extended contact surface 43 may also have grooves or projections that improve the sealing function even more. Fig. 12 f) shows a side cross-section of a second chamber 4 with a plurality of separate connection elements 5 and an extended contact surface due to support part 43.

In principle, the form of the second chamber 4 can thus be adjusted to the anatomy of the erogenous zone to be stimulated. The form of chamber 4 in Fig. 12 a) is, for example, adjusted to the round shape of the breast, while the form of chamber 4 in Fig. 12 c) is better suited to the form of the female vulva. Furthermore, the shape of the second chamber 4 also determines the characteristic of the pressure field according to the invention. The size of the second chamber 4 in ratio the volume displaced from chamber 3 thus determines the amount of the achievable negative- or positive-pressure. Furthermore, the proximity of opening 51 of connection element 5 to the area of skin to be stimulated can also be used to determine the intensity of the massage effect according to the invention on said area of skin. A plurality of openings 51, cf. Fig. 12 d) allows the massage effect to be distributed to a plurality of areas. Thus, for example, the clitoris can be less directly stimulated at the very sensitive clitoris glans (cf. Fig. 12 e), and more stimulated at the areas surrounding the clitoris glans, in order to prevent overstimulation of the clitoris.

Fig. 13 shows a block diagram of an example of the functional construction of an embodiment of the present invention with a control device 7, a drive unit 6, lighting 9, an on/off switch 74, operating elements 71, a battery 76 and an external power supply 73.

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Control device 7, which has a microcontroller or is hardwired, for example, initially controls the power supply of all users of stimulation device 1, as well as an optional charging and discharging process of battery 76 and/or a battery management. In particular, control device 7 controls the excitation of drive unit 6, such as the size of the deflection, the frequency, the modulation, etc.

Furthermore, control device 7 may have a memory in which at least one modulation or stimulation pattern (described in more detail in conjunction with Fig. 14 a) to d)) is saved. The excitation of drive unit 6 can now be activated via operating elements 71 in compliance with the previously saved stimulation pattern at the discretion of the user of stimulation device 1. The stimulation pattern of the pressure field can also be optionally and individually adjusted and saved by the user via the operating elements.

Fig. 14 a) shows the chronological sequence of a total pressure p in the pressure field generator (2) when using the latter for stimulation. The broken line provides the reference pressure, such as the currently prevailing atmospheric pressure that exists outside the pressure field generator (2). If the second chamber 4 is now placed on body part 11 to be stimulated, the originally prevailing ambient pressure in the pressure field generator (2) is maintained, for example. It is now assumed that the second chamber 4 is sealed tightly to the body part to be stimulated for the most part. Once the stimulation device is activated, drive unit 6 is activated or excited by control device 7 according to a previously saved stimulation pattern. Accordingly, the volume of the first chamber 3 and thus the total pressure in pressure field generator 2 are modified, with the pressure modifications being modified to the reference pressure. The pressure or stimulation pattern shown as an example in Fig. 14 a) develops a pulsed, regular pressure field. In phases of pressure increase, the erogenous zone to be stimulated is blown on or massaged, while in the times when a negative-pressure prevails, the

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blood circulation of body part 11, the clitoris for example, is promoted. Thus, time periods according to the invention exist (designated in Fig. 14 a) as I)) in which a negative-pressure prevails, while the clitoris is simultaneously indirectly massaged.

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Fig. 14 b) shows three examples of alternative stimulation patterns. Thus, the area designated as II) shows a pulsed stimulation pattern with high amplitude. The area designated as III) shows a pulsed stimulation pattern with low amplitude. Furthermore, the area designated as IV) illustrates an irregular and asymmetrical stimulation pattern as regards chronological sequence and amplitude. The patterns can be varied according to individual bodily effect/use and according to individual wishes.

Fig. 14 c) shows another example of an alternative stimulation pattern. The strength of pressure may, for example, increase with time, in order to adjust to the user's state of excitement.

In addition to the explained embodiments, the invention allows other basic design principles. For example, different arrangements or constructions of the first chamber 3 may be arbitrarily combined with various embodiments of the second chamber 5 or connection element 5. For example, the first chamber 3 with the drive in Fig. 10 can be combined with the second chamber in Fig. 12 f).

Although only one first chamber 3 is shown in all embodiments, two or more first chambers 3 may be present, which are then appropriately activated simultaneously or time-delayed in such a way that their volume is modified in order to build up a pressure field according to the invention.

Although only one opening from the first chamber 3 to connection element 5 is shown in all embodiments, a plurality of openings for a connection element 5 or

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even more openings for a plurality of connection elements 5 may be present in the first chamber 3.

A stimulation device 1 can have a plurality of pressure field generator 2.

5 Thus, for example, two pressure field generators may be available to stimulate two erogenous zones simultaneously.

The stimulation patterns according to the invention can deviate from the patterns shows in Fig. 14 a), b) and c), as long as they have a chronological
10 sequence of over- and negative-pressures. For example, a relatively long-lasting negative-pressure can initially be built up at the beginning or after activation of the device (3 minutes for example), in order to effectively increase the blood circulation of the zone to be stimulated, whereupon pulsed negative- and over-
15 pressures of a slowly increasing amplitude then follow.

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List of Reference Numerals:

	1	Stimulation device
	2	Pressure field generator
5	3	First chamber
	4	Second chamber
	5	Connection element
	6	Drive unit
	7	Control device
10	8	Housing
	9	Lighting
	11	Body part
	12	Clitoris
	31	Wall of first chamber
15	32	Holder
	41	Wall of second chamber
	42	Opening of first chamber
	43	Contact surface
	51	Opening of connection element to second chamber
20	61	Drive shaft
	62	Eccentric
	63	Piston
	64	Bending element
	71	Operating element
25	72	Display
	73	Power supply
	74	On/off switch
	75	Socket
	76	Battery
30	77	Control board

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Claims

5 **1.** Stimulation device (1) for erogenous zones, especially for the clitoris (12),
 comprising:

 at least one pressure field generator (2) with:

10 at least one first chamber (3); and

 at least one second chamber (4) with at least one opening (42) for
 placing on a body part (11); and

15 at least one connection element (5) that connects the first
 chamber (3) with the second chamber (4); and

 a drive unit (6) that varies the volume of the first chamber (3) in
 such a way that a stimulating pressure field is generated by the
 connection element (5) in the second chamber (4); and

20 a control device (7) that actuates the drive unit (6).

25 **2.** Stimulation device (1) according to claim 1, wherein

 the pressure field generated in the second chamber (4) consists of a pattern
 of negative- and positive-pressures, modulated with respect to a reference
 pressure, preferably the normal pressure.

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3. Stimulation device (1) according to claim 1 or 2, wherein

the first chamber (3) is connected solely with the second chamber (4) by the connection element (5).

5

4. Stimulation device (1) according to any one of claims 1 to 3, wherein

the at least one opening (51) of at the least one connection element (5) is arranged opposite to the body part (11) to be stimulated, and is directed towards the body part (11) to be stimulated.

10

5. Stimulation device (1) according to any one of claims 1 to 4, wherein

the second chamber (4) is made of a flexible material, preferably silicone or rubber, and/or of an at least partially transparent material and/or is fitted to the shape of the vaginal labia minora in such a way that the latter is completely covered by the opening of the second chamber (4).

15

20

6. Stimulation device (1) according to any one of claims 1 to 5, wherein

the second chamber (4) is designed in one-piece with the connection element (5) and the first chamber (3).

25

7. Stimulation device (1) according to any one of claims 1 to 5, wherein

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the second chamber (4) of the stimulation device (1) is arranged to be replaceable.

5 **8.** Stimulation device (1) according to any one of claims 1 to 5, wherein

the second chamber (4) is arranged separately from the stimulation device (1), and

10 the connection element (5) is a hose or a tube.

9. Stimulation device (1) according to any one of claims 1 to 8, wherein

15 the second chamber (4) has a sealing bearing part (43) to enlarge the contact surface of the second chamber (4) on the skin.

20 **10.** Stimulation device (1) according to any one of claims 1 to 9, wherein

the respective modulation of the pressure field is modifiable by means of an operating element (71).

25 **11.** Stimulation device (1) according to any one of claims 1 to 10, wherein

the stimulation device (1) has lighting (9), preferably an LED lighting, for lighting the second chamber (4).

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12. Stimulation device (1) according to any one of claims 1 to 11, wherein

5 the connection element (5) has an internal shape and an opening to the second chamber (4) designed in such a way that the pressure field is modulated in direction and characteristic.

13. Stimulation device (1) according to any one of claims 1 to 12, wherein

10 the stimulation device (1) is a hand-held, preferably battery-powered, device.

14. System with a stimulation device (1) according to any one of claims 1 to 13, comprising:

15 a remote control device arranged separately to the stimulation device (1),

wherein then control device (7) of the stimulation device (1) can be remote controlled by the remote control device.

20

15. Method for stimulating erogenous zones, especially the clitoris (12), comprising the following steps:

25 forming a pressure field directed towards a body part (11); and

modulating the pressure field with a pattern of negative- and positive-pressures with respect to a reference pressure, preferably normal pressure.

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16. Method for stimulating erogenous zones according to claim 15, wherein

the stimulation effect is individually influenced by modulating the pressure field by means of an operating element (71).

5

17. Method for stimulating erogenous zones according to claim 15 or 16, wherein

10 the modulation is in the form of pulses.

18. Method for stimulating erogenous zones, especially the clitoris (12), with the stimulation device (1) according to any one of claims 1 to 13, comprising the following steps:

15

placing the second chamber (4) over the body part (11), preferably over the clitoris (12);

20 forming a pressure field directed towards the body part (11);

modulating the pressure field with a pattern of negative- and positive-pressures, with respect to a reference pressure, preferably normal pressure;

25 discontinuing the second chamber (4) of the body part (11).

19. Use of the stimulation device (1) according to any one of claims 1 to 13 as a sex toy for stimulating the female clitoris.

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Abstract

The invention relates to a stimulation device (1) for erogenous zones, in particular for the clitoris (12), which device (1) has at least one pressure field
5 generator (2) with at least a first chamber (3) and at least a second chamber (4) with at least one opening (42) for placing onto a body part (11), and at least one connection element (5) which connects the first chamber (3) to the second chamber (4), and with a drive unit (6) which changes the volume of the first chamber (3) in such a way that, by way of the connection element (5), a pressure
10 field is generated in the second chamber (4) and serves for stimulation; and a control device (7) which controls the drive unit (6).